

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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Operator: PEOPLES GAS LIGHT AND COKE CO.	Operator ID#: 15329
Inspection Date(s): 2/10/2016, 2/9/2016	Man Days: 2
Inspection Unit: Mahomet Transmission	
Location of Audit: Fisher	
Exit Meeting Contact:	
Inspection Type: Standard Inspection Plan Review- O and M	
Pipeline Safety Representative(s): Kevin Hecker	
Company Representative to Receive Report: Amy Kenny, Tom Webb	
Company Representative's Email Address: ALKenny@peoplesgasdelivery.com, TJWebb@peoplesgasdelivery.com	

Headquarters Address Information:	200 E. Randolph Street Chicago, IL 60601 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Charles Matthews Phone#: (312) 240-5305 Email: CRMatthews@peoplesgasdelivery.com	
Inspection Contact(s)	Title	Phone No.

REPORTING PROCEDURES		Status
<u>Category Comment:</u> <i>Reporting procedures are part of the Emergency Operations Manual</i>		
[192.605(b) (4)][191.5]	Does the operator's procedure require Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Satisfactory
<u>General Comment:</u> <i>See Emergency Operating Plan, Section 5, Page 11, Notification of Outside Agencies,</i>		
[192.605(b) (4)][191.9(a)]	Does the operator's procedure require a DOT Incident Report Form 7100.1 submitted within 30 days after detection of an incident?	Not Applicable
<u>General Comment:</u> <i>PGL Mahomet Transmission does not contain distribution pipelines.</i>		

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[192.605(b) (4)][191.9(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100.1)	Not Applicable
General Comment: PGL Mahomet Transmission does not contain distribution pipelines.		
[192.605(b) (4)][191.15(a)]	Does the operator's procedure require a DOT Incident Report Form 7100-2 submitted within 30 days after detection of an incident?	Satisfactory
General Comment: See Emergency Operating Plan, Section 5, Page 2, Notification of Outside Agencies		
[192.605(b) (4)][191.15(c)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100-2)	Satisfactory
General Comment: See Emergency Operating Plan, Section 5, Page 2, Notification of Outside Agencies		
[192.605(a)][191.25]	Does the operator's procedure require filing the SRCR within 5 days of determination, but not later than 10 days after discovery?	Satisfactory
General Comment: See Emergency Operating Plan, Section 5, Page 20, Notification of Outside Agencies		
[192.605(d)][191.23]	Does the operator's procedure contain instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions?	Satisfactory
General Comment: See Emergency Operating Plan, Section 5, Pages 20 & 21, Notification of Outside Agencies		
[192.605(a)][191.29]	Does the operator's procedure contain requirements for gas transmission pipelines and liquefied natural gas facilities to submit geospatial data to PHMSA?	Satisfactory
General Comment: Staff reviewed documentation demonstrating that geospatial data has been submitted to PHMSA.		
[595.120.(a)]	Reports of Accidents: Does the operator have provisions for reporting accidents or damage to the ICC? (217-782-5050)	Satisfactory
General Comment: See Emergency Operating Plan, Section 5, Page 11, Notification of Outside Agencies.		
CUSTOMER NOTIFICATION AND EFV INSTALLATION PROCEDURES		Status
[192.13(c)][192.16]	Does the operator have procedures for notifying new customers, within 90 days, of their responsibility for	Not Applicable

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	those sections of service not maintained by the operator?	
<u>General Comment:</u> PGL Mahomet Transmission does not contain distribution pipelines.		
[192.13(c)][192.381]	Does the operator's procedure require that when an EFV is installed at a single family residence, the EFV shall, at a minimum, meet the performance requirements of §192.381?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission does not contain distribution pipelines.		
INSTALLATION OF TRANSMISSION & DISTRIBUTION MAIN PIPE		Status
[192.13(c)][192.319]	Does the operator's procedure contain specifications for installation of transmission line or main in a ditch?	Satisfactory
<u>General Comment:</u> See Integrays Transmission Pipeline Construction Standard 120		
[192.13(c)][192.321]	Does the operator's procedure contain specifications for installation of plastic pipe in the ditch including a means of locating pipe?	Not Applicable
<u>General Comment:</u> PGL Mahomet does not contain any plastic pipelines.		
[192.13(c)][192.323]	Does the operator's procedure contain casing requirements?	Satisfactory
<u>General Comment:</u> See O&M, Corrosion Control and Design, Exhibit XIII, Page 12, Casing Installation		
[192.13(c)][192.325]	Does the operator's procedure contain underground clearance specifications?	Satisfactory
<u>General Comment:</u> See O&M, Section I - One Call System, Page 5G, Foreign Structures; see also Standard CR2		
[192.13(c)][192.327]	Does the operator's procedure specify the amount of cover required for various types of installations?	Satisfactory
<u>General Comment:</u> See O&M, Section I - One Call System, Page 5G, Foreign Structures; see also Standard CR2		
[192.13(c)][192.321(g)]	Does the operator's procedure specify the time limitations for exposure to UV rays for PE pipe?	Not Applicable
<u>General Comment:</u> PGL Mahomet does not contain any plastic pipelines.		

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SERVICE LINE INSTALLATION		Status
Category Comment:		
PGL Mahomet does not contain distribution pipelines.		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as depth?	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as support and backfill	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as protection against strain and loading	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line into a building	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line under a building	Not Applicable
[192.13(c)][192.365]	Does the operator's procedure address service line valve location?	Not Applicable
[192.13(c)][192.367]	Does the operator's procedure include specifications for service line connection to the main?	Not Applicable
CUSTOMER METERS AND REGULATORS		Status
Category Comment:		
PGL Mahomet does not contain any distribution pipelines.		
[192.13(c)][192.353]	Does the operator's procedure contain requirements for the location of meters and regulators?	Not Applicable
[192.13(c)][192.355]	Does the operator's procedure contain provisions to protect customer's meters and regulators from damage?	Not Applicable
[192.13(c)][192.357(a)]	Does the operator's procedure require each regulator and meter to be installed so as to minimize anticipated stresses upon the connecting piping and the meter?	Not Applicable
[192.13(c)][192.357(d)]	Does the operator's procedure require each regulator that might release gas in its operation to be vented to the outside atmosphere?	Not Applicable
NORMAL OPERATING AND MAINTENANCE PROCEDURES		Status
[192.605(a)]	Does the operator's procedure require the O&M Plan to be reviewed and updated at a minimum of 1 per year/15 months?	Satisfactory
General Comment:		

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See O&M, General Section, Page 27		
Does the operator's procedure require the OQ Plan to be reviewed and updated in connection with the O&M Plan review at a minimum of 1 per year/15 months?		Yes
Do procedures clearly include the name of the reviewer and dates of reviews?		Yes
[192.605(a)][192.605(b)(3)]	Does the operator's procedure require making construction records, maps, and operating history available to appropriate operating personnel?	Unsatisfactory
<u>NOA Comment:</u> <i>The operator's procedure does not require making construction records, maps, and operating history available to appropriate operating personnel.</i>		
[192.605(a)][192.605(b)(5)]	Does the operator's procedure contain provisions for start up and shut down of a pipeline to assure operation within MAOP plus allowable buildup?	Satisfactory
<u>General Comment:</u> <i>Station Operating Procedures for each station includes instructions to prevent exceeding MAOP at start up.</i>		
[192.605(a)][192.605(b)(8)]	Does the operator's procedure contain provisions for periodically reviewing the work done by operator's personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found?	Satisfactory
<u>General Comment:</u> <i>See O&M, General Section II, Training, Page 1</i>		
[192.605(a)][192.605(b)(9)]	Does the operator's procedure contain provisions taking for adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapors or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line? If not, then does the plan include prohibiting personnel from entering excavated trenches that may be hazardous?	Satisfactory
<u>General Comment:</u> <i>See O&M, General Section II, Training, Page 2</i>		
ABNORMAL OPERATING PROCEDURES FOR TRANSMISSION		Status
[192.605(a)][192.605(c)(1)(i)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of unintended closure of valves or shut downs?	Satisfactory
<u>General Comment:</u> <i>See O&M, General Section, Page 7, Part H, Abnormal Conditions</i>		
[192.605(a)][192.605(c)(1)(ii)]	Does the operator's procedure contain provisions for	Satisfactory

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	responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside of normal operating limits?	
<u>General Comment:</u> See O&M, General Section, Page 7, Part H, Abnormal Conditions		
[192.605(a)][192.605(c)(1)(iii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of loss of communications?	Satisfactory
<u>General Comment:</u> See O&M, General Section, Page 7, Part H, Abnormal Conditions		
[192.605(a)][192.605(c)(1)(iv)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of the operation of any safety device?	Satisfactory
<u>General Comment:</u> See O&M, General Section, Page 7, Part H, Abnormal Conditions		
[192.605(a)][192.605(c)(1)(v)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operations or personnel error?	Satisfactory
<u>General Comment:</u> See O&M, General Section, Page 7, Part H, Abnormal Conditions		
[192.605(a)][192.605(c)(2)]	Does the operator's procedure contain provisions for checking variations from normal operation after abnormal operations ended at sufficient critical locations?	Satisfactory
<u>General Comment:</u> See O&M, General Section, Page 7, Part H, Abnormal Conditions		
[192.605(a)][192.605(c)(3)]	Does the operator's procedure contain provisions for notifying the responsible operating personnel when notice of an abnormal operation is received?	Satisfactory
<u>General Comment:</u> See O&M, General Section, Page 7, Part H, Abnormal Conditions		
[192.605(a)][192.605(c)(4)]	Does the operator's procedure contain provisions for periodically reviewing the response of operating personnel to determine the effectiveness of the procedures and taking corrective action where deficiencies are found?	Satisfactory
<u>General Comment:</u> See O&M, General Section, Page 8, Part H, Abnormal Conditions		

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CHANGE IN CLASS LOCATION PROCEDURES		Status
[192.605(b) (1)][192.609]	Does the operator's procedure contain provisions for conducting a class location survey whenever an increase in populations density indicates a change in class location or a segment of an existing steel pipeline operating at a hoop stress that is more than 40 percent of SMYS, or indicates that the hoop stress corresponding to the established MAOP for a segment of existing pipeline is not commensurate with the present class location?	Satisfactory
General Comment: See O&M, Exhibit XIII, General Section, Page 31, House Count Survey		
[192.605(b) (1)][192.611]	In the event a change in class location becomes necessary does the manual contain procedures for confirmation or revision of the MAOP?	Satisfactory
General Comment: See O&M, Exhibit XIII, General Section, Page 31, House Count Survey		
CONTINUING SURVEILLANCE PROCEDURES		Status
[192.613(a)]	Does the operator's procedure include requirements for continuing surveillance of facilities to determine and take appropriate action concerning class location changes, failures, leak history, corrosion, cathodic protection requirements, and other unusual operating conditions?	Satisfactory
General Comment: See O&M, Exhibit XIII, General Section, Page 5, Continuing Surveillance		
[192.613(a)][192.613(b)]	Does the operator's procedure include requirements for reducing the MAOP, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition?	Satisfactory
General Comment: See O&M, Exhibit XIII, General Section, Pages 6&7, Continuing Surveillance		
[192.613(a)][192.459]	Does operator have procedures for determining if exposed cast iron was examined for evidence of graphitization and, if necessary, were remedial actions taken?	Not Applicable
General Comment: PGL Mahomet does not contain any cast iron pipelines.		
[192.613(a)][192.489]	Does the operator's procedure include requirements for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history,	Not Applicable

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	or any other unusual operating maintenance conditions?	
General Comment:		
PGL Mahomet does not contain any cast iron pipelines.		
DAMAGE PREVENTION PROGRAM PROCEDURES		Status
[192.605(a)][192.614(c)(1)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-identifies persons who engage in excavating?	Satisfactory
General Comment:		
See O&M, Exhibit IX, Page 2, Damage Prevention Program		
[192.605(a)][192.614(c)(2)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-provides notification to the public in the One Call area?	Satisfactory
General Comment:		
See O&M, Exhibit IX, Page 2, Damage Prevention Program		
[192.605(a)][192.614(c)(3)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-provides means for receiving and recording notifications of pending excavations?	Satisfactory
General Comment:		
See O&M, Exhibit IX, Page 2, Damage Prevention Program		
[192.605(a)][192.614(c)(4)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-provides notification of pending excavations to the members?	Satisfactory
General Comment:		
See O&M, Exhibit IX, Pages 4 & 5, One-call Systems		
[192.605(a)][192.614(c)(5)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-provides means of temporary marking for the pipeline in the vicinity of the excavations?	Satisfactory
General Comment:		
See O&M, Exhibit IX, Page 7 & 8, Temporary Marking Buried Pipelines/Facilities		
[192.605(a)][192.614(c)(6)(i)]	Does the operator's procedure provide for follow-up	Satisfactory

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	inspection of the pipeline where there is reason to believe the pipeline could be damaged- Inspection must be done to verify integrity of the pipeline?	
General Comment: See O&M, Exhibit IX, Page 9, Leak Survey and Inspection of PGL Facilities, Pipelines in Close Proximity to Foreign Excavation/Construction Projects		
[192.605(a)][192.614(c)(6)(ii)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- After blasting, a leak survey must be conducted as part of the inspection by the operator?	Satisfactory
General Comment: See O&M, Exhibit IX, Page 10, Leak Survey and Inspection of PGL Facilities, Pipelines in Close Proximity to Foreign Excavation/Construction Projects		
Has the Operator adopted the applicable Common Ground Alliance Best Practices?		Yes
Does the operator have adequate directional drilling/boring procedures to determine effective actions to protect their underground facilities from the dangers posed by directional drilling and other trenchless technology? A pipeline operator's damage prevention program shall include actions to protect their facilities when directional drilling operations are conducted in proximity to the pipeline. These procedures should include, but are not limited to, accurately locating underground piping and reviewing personnel qualifications?		Yes
General Comment: See O&M, Exhibit IX, Page 10, Leak Survey and Inspection of PGL Facilities, Pipelines in Close Proximity to Foreign Excavation/Construction Projects		
[IL ADM. CO.265.100(b)]	Does the operator have procedures to report third party damage to mains, when a release of gas occurs, reported to ICC JULIE Enforcement?	Satisfactory
General Comment: See O&M, Exhibit IX, Page 11, Leak Survey and Inspection of PGL Facilities, Pipelines in Close Proximity to Foreign Excavation/Construction Projects		
EMERGENCY PROCEDURES		Status
[192.615(a)(1)]	Does the operator have procedures for receiving, identifying, and classifying notices of events, such as, gas odor inside or near a building?	Satisfactory
General Comment: See O&M, Exhibit VII, Pages 8 & 9, Response Procedures Transmission		
[192.615(a)(2)]	Does the operator have procedures for establishing and maintaining communication with appropriate public officials regarding a possible emergency?	Satisfactory
General Comment: See O&M, Exhibit VII, Section X, Page 1, Integrys Public Awareness		

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[192.615(a)(3)(i)]	Does the operator have procedures for prompt response to gas detected inside or near a building?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Pages 8 & 9, Response Procedures Transmission</i>		
[192.615(a)(3)(ii)]	Does the operator have procedures for prompt response to a fire located near a pipeline?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 6, Fire</i>		
[192.615(a)(3)(iii)]	Does the operator have procedures for prompt response to an explosion near a pipeline?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 6, Fire</i>		
[192.615(a)(3)(iv)]	Does the operator have procedures for prompt response to natural disasters?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 7, Natural Disasters</i>		
[192.615(a)(4)]	Does the operator have procedures for the availability of personnel, equipment, instruments, tools, and material required at the scene of an emergency?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 5, Scene of Emergency</i>		
[192.615(a)(5)]	Does the operator have procedures for actions directed towards protecting people first, then property?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 4, Scene of Emergency</i>		
[192.615(a)(6)]	Does the operator have procedures for emergency shutdown or pressure reduction to minimize hazards to life or property?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 4, Scene of Emergency</i>		
[192.615(a)(7)]	Does the operator have procedures to require making safe any actual or potential hazard to life or property?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 4, Scene of Emergency</i>		

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[192.615(a)(8)]	Does the operator have procedures requiring the notification of appropriate public officials required at the emergency scene and coordinating planned and actual responses with these officials?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 4, Scene of Emergency</i>		
[192.615(a)(9)]	Does the operator have procedures for restoring service outages after the emergency has been rendered safe?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 5, Scene of Emergency</i>		
[192.615(a)(10)]	Does the operator have procedures for investigating accidents and failures as soon as possible after the emergency?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 3, Responding to an Emergency Notification</i>		
[192.615(b)(1)]	Does the operator have procedures for furnishing applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 4, Notifying Local Public Officials and Outside Agencies</i>		
[192.615(b)(2)]	Does the operator have procedures for training appropriate employees as to the requirements of the emergency plan and verifying effectiveness of training?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 1, Personnel Training</i>		
[192.615(b)(3)]	Does the operator have procedures for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit VII, Page 1, Personnel Training</i>		
[192.615(c)]	Does the operator have procedures to establish and maintain liaison with appropriate public officials, such that both the operator and public officials are aware of each other's resources and capabilities in dealing with gas emergencies?	Satisfactory
<u>General Comment:</u>		

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See O&M, Exhibit VII, Page 5, Scene of Emergency

Does the operator have procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings?		Yes
FAILURE INVESTIGATION PROCEDURES		Status
[192.617]	Does the operator have procedures for analyzing accidents and failures, including laboratory analysis where appropriate, to determine cause and prevention of recurrence?	Satisfactory
General Comment:		
See O&M, Exhibit VII, Page 1, Procedure for Failure Investigation		
MAOP PROCEDURES		Status
[192.605(b) (1)][192.621]	Does the operator have procedures for establishing the MAOP for High Pressure Distribution Systems?	Not Applicable
General Comment:		
PGL Mahomet Transmission system does not contain high pressure distribution pipelines.		
[192.605(b) (1)][192.623]	Does the operator have procedures for establishing the Minimum and Maximum Allowable Operating Pressure for Low Pressure Distribution Systems?	Not Applicable
General Comment:		
PGL Mahomet Transmission system does not contain low pressure distribution pipelines.		
[192.605(b) (1)][192.619(a)(1)]	Is MAOP determined by design and test? or	Satisfactory
General Comment:		
See Integrys Standards, Section 1100, Methods for Determining MAOP		
[192.605(b) (1)][192.619(a)(2)]	Does the operator have procedures requiring the MAOP to be determined by test pressure divided by applicable factor?	Satisfactory
General Comment:		
See Integrys Standards, Section 1100, Methods for Determining MAOP		
[192.605(b) (1)][192.619(a)(3)]	Does the operator have procedures requiring the MAOP to be determined by highest operating pressure to which the segment of line was subjected between July 1, 1965 and July 1, 1970?	Satisfactory
General Comment:		
See Integrys Standards, Section 1100, Methods for Determining MAOP		
[192.605(b) (1)][192.619(a)(4)]	Does the operator have procedures requiring the MAOP to be determined by the maximum safe pressure determined by operator?	Satisfactory

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<u>General Comment:</u>		
See Integrlys Standards, Section 1100, Methods for Determining MAOP		
[192.605(b) (1)][192.619(b)]	Does the operator have procedures requiring overpressure devices be installed if .619 (a) (4) is applicable?	Satisfactory
<u>General Comment:</u>		
See O&M Exhibit XIII, Page 2, Station Operating Procedures		
[192.605(b) (5)]	Does the operator have procedures for start up and shut down within MAOP of the pipeline?	Satisfactory
<u>General Comment:</u>		
Station Operating Procedures for each station includes instructions to prevent exceeding MAOP at start up or shut down.		
Does the operator install pipelines to operate under alternative MAOP requirements?		No
[192.605(b) (1)][192.620(b) (4)]	If yes, does the operator have procedures to require the additional construction requirements included under 192.328?	Not Applicable
<u>General Comment:</u>		
PGL Mahomet Transmission does not operate at an alternative MAOP.		
[192.13(c)][192.328(b)]	If yes, does the operator have procedures requiring all girth welds to be non-destructively tested in accordance with 192.243 (b) and (c)?	Not Applicable
<u>General Comment:</u>		
PGL Mahomet Transmission does not operate at an alternative MAOP.		
PRESSURE TEST PROCEDURES		Status
[192.13(c)]	Does the plan allow for the use of pre-tested pipe for repairs?	Satisfactory
<u>General Comment:</u>		
See O&M, Exhibit XIII, Page 9, Replacement Pipe		
[192.13(c)][192.503(a)(1)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until it is pressure tested in accordance with this subpart and §192.619 to substantiate the maximum allowable operating pressure; and	Satisfactory
<u>General Comment:</u>		
See Integrlys Standards 1030.6, Page 17, Pressure Test Acceptance Criteria		
[192.13(c)][192.503(a)(2)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or	Satisfactory

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	replaced, until all potentially hazardous leaks have been located and eliminated?	
<u>General Comment:</u> <i>See Integrys Standards 1030.6, Page 17, Pressure Test Acceptance Criteria</i>		
[192.13(c)][192.503(b)(1),192.503(b)(2),192.503(b)(3)]	Does the operator's procedure indicate that, for a new segment of pipeline, or a segment of pipeline that has been relocated or replaced, the pressure test medium must be liquid, air, natural gas, or inert gas that is compatible with the material of which the pipeline is constructed, relatively free of sedimentary materials, and except for natural gas, nonflammable?	Satisfactory
<u>General Comment:</u> <i>See Integrys Standards 1030.4, Page 5, Pressure Testing Medium</i>		
[192.13(c)][192.503(d)]	Does the operator's procedure indicate that each joint used to tie in a test segment of pipeline is excepted from the specific test requirements of this subpart, but each non-welded joint must be leak tested at not less than its operating pressure?	Satisfactory
<u>General Comment:</u> <i>See Integrys Standards 1030.5.14, Page 16, Tie-in Testing</i>		
[192.13(c)][192.503(e)]	Does the operator's procedure require a strength test for pipeline components other than pipe if not certified by manufacturer?	Not Applicable
<u>General Comment:</u> <i>PGL Mahomet Transmission only utilizes rated and stamped heavy wall components.</i>		
[192.13(c)][192.505(a)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more which are based on class location?	Satisfactory
<u>General Comment:</u> <i>See Integrys Standards 1030.5.6, Page 12, Steel Pipelines to Operate at 30% or more of SMYS</i>		
[192.13(c)][192.505(c)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more to be tested at or above the required test pressure for at least 8 hour?	Satisfactory
<u>General Comment:</u> <i>See Integrys Standards 1030.5.6, Page 12, Steel Pipelines to Operate at 30% or more of SMYS</i>		
[192.13(c)][192.505(d)]	Except for service lines, Does the operator's procedure include requirements for fabricated units	Satisfactory

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	and short sections of pipe which operates at a hoop stress of 30% or more of SMYS and for which a post installation test is impractical, that a pre-installation strength test must be conducted by maintaining the pressure for at least 4 hours?	
General Comment: <i>See Integritys Standards 1030.5.6, Page 12, Steel Pipelines to Operate at 30% or more of SMYS</i>		
[192.13(c)][192.507]	Does the operator's procedure include requirements for testing pipelines, which operate at a hoop stress less than 30% of SMYS and at or above 100 psig?	Satisfactory
General Comment: <i>See Integritys Standards 1030.5.5, Page 11, Steel Pipelines to Operate at less than 30% SMYS and at or above 100 psig</i>		
[192.13(c)][192.509(b)]	Does the operator's procedure include requirements for testing steel main which operate below 100 psig at a minimum of 10 psig for main that operates below 1 psig and for each steel main to operate below 100 psig test to a minimum of 90 psig for main that operates over 1 psig?	Not Applicable
General Comment: <i>No sections of PGL's Mahomet Transmission pipeline operates below 100 psig.</i>		
[192.13(c)][192.511(b)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure as follows: 50 psig if the line operates over 40 psig?	Not Applicable
General Comment: <i>PGL Mahomet Transmission does not contain any service lines.</i>		
[192.13(c)][192.511(c)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure of 90 psig if the line operates over 40 psig, unless the service line is stressed to 20% or more SMYS then testing must be conducted in accordance with 192.507?	Not Applicable
General Comment: <i>PGL Mahomet Transmission does not contain any service lines.</i>		
[192.13(c)][192.513(b)]	Does the operator's procedure insure discovery of all potentially hazardous leaks in the segment being tested?	Satisfactory
General Comment: <i>See Integritys Standards 1030.6, Page 17, Pressure Test Acceptance Criteria</i>		
[192.13(c)][192.513(c)]	Does the operator's procedure include test requirements for plastic pipelines of 150% of MOP or	Not Applicable

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	50 psig whichever is greater?	
<u>General Comment:</u> PGL Mahomet Transmission system does not contain plastic pipe.		
[191.13(c)][192.513(d)]	Does the operator's procedures require that when testing thermoplastic material the temperature may not be more than 100 F or the temperature at which the material's long-term hydrostatic strength has been determined under the listed specification, whichever is greater?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission system does not contain plastic pipe.		
[192.13(c)][192.517(a)(1)]	Does the plan require test records for pipelines that operate over 100 psig that include: Operators name, responsible employee's name, name of testing company?	Satisfactory
<u>General Comment:</u> See Integritys Standards 1030.9, Page 18, Recordkeeping		
[192.13(c)][192.517(a)(2)]	Does the plan require test records for pipelines that operate over 100 psig that include test medium?	Satisfactory
<u>General Comment:</u> See Integritys Standards 1030.9, Page 18, Recordkeeping		
[192.13(c)][192.517(a)(3)]	Does the plan require test records for pipelines that operate over 100 psig that include test pressure?	Satisfactory
<u>General Comment:</u> See Integritys Standards 1030.9, Page 18, Recordkeeping		
[192.13(c)][192.517(a)(4)]	Does the plan require test records for pipelines that operate over 100 psig that include test duration?	Satisfactory
<u>General Comment:</u> See Integritys Standards 1030.9, Page 18, Recordkeeping		
[192.13(c)][192.517(a)(5)]	Does the plan require test records for pipelines that operate over 100 psig that include pressure recording charts of readings?	Satisfactory
<u>General Comment:</u> See Integritys Standards 1030.9, Page 18, Recordkeeping		
[192.13(c)][192.517(a)(7)]	Does the plan require test records for pipelines that operate over 100 psig that include leaks and failures noted?	Satisfactory
<u>General Comment:</u>		

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See Integrys Standards 1030.9, Page 18, Recordkeeping

ODORIZATION of GAS PROCEDURES		Status
[192.605(b) (1)][192.625(a)]	Does the operator's procedure include a requirement that distribution lines must contain odorized gas?	Not Applicable
General Comment: PGL Mahomet Transmission does not contain any distribution lines.		
[192.605(b) (1)][192.625(b)]	Does the operator's procedure require odorized gas in Class 3 or 4 locations (if applicable)?	Satisfactory
General Comment: See O&M, Exhibit IV, Page 2, Odorization		
[192.605(b) (1)][192.625(f)]	Does the operator's procedure require periodic gas sampling, using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable?	Satisfactory
General Comment: See O&M, Exhibit III, Page 9, Odorant Monitoring		
TAPPING PIPELINES UNDER PRESSURE PROCEDURES		Status
[192.605(b) (1)][192.627]	Does the plan provide for adequate tapping procedures for pipelines under pressure?	Satisfactory
General Comment: See O&M, Exhibit XIII, Section II, Page 11, Hot Tap Procedure		
[192.605(b) (1)][192.627]	Does the operator's procedure require that hot taps be made by a qualified crew?	Satisfactory
General Comment: See O&M, Exhibit XIII, Section II, Page 11, Hot Tap Procedure		
PIPELINE PURGING PROCEDURES		Status
[192.605(b) (1)][192.629(a)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing air must be properly purged?	Satisfactory
General Comment: See Integrys Standards, Section 1030.3.2 Purging Facilities into Service, Page 7		
[192.605(b) (1)][192.629(b)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing gas must be properly purged?	Satisfactory
General Comment:		

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See Integrus Standards, Section 1040.4.3 Purging Facilities into Service, Page 8

MAINTENANCE PROCEDURES		Status
[192.605(a)][192.703(b)]	Does the operator's procedure require that each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service?	Satisfactory
General Comment: See O&M, Exhibit XIII, Section I, Page 8E, Defects Requiring Immediate Action and Section I, Page 8F, Defects Requiring Immediate Action		
[192.605(a)][192.703(c)]	Does the operator's procedure require that hazardous leaks must be repaired promptly?	Satisfactory
General Comment: See O&M, Exhibit XIII, Section I, Page 8, Defects Requiring Immediate Action		
TRANSMISSION LINES - PATROLLING & LEAKAGE SURVEY PROCEDURES		Status
[192.605(b) (1)][192.705(a)]	Does the operator's procedure require patrolling of surface conditions on and adjacent to transmission line right of way for indications of leak, construction activities, and other factors affecting safety and operations?	Satisfactory
General Comment: See O&M, Exhibit XIII, Section II, Page 1, Inspections and Surveys, Aerial Survey		
[192.605(b) (1)][192.705(b)]	Does the operator's procedure require that the frequency of patrols is to be determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in .705(b)?	Satisfactory
General Comment: See O&M, Exhibit XIII, Section II, Page 1, Inspections and Surveys, Aerial Survey		
[192.605(b) (1)][192.706]	Does the operator's procedure require leakage surveys at a minimum of 1 year/15 months	Satisfactory
General Comment: See O&M, Exhibit XIII, Section II, Page 4, Leakage Surveys		
[192.605(b) (1)][192.706(a)]	Does the operator's procedure include leak detector equipment survey requirements for transmission lines transporting un-odorized gas in Class 3 locations 7½ months but at least twice each calendar year?	Not Applicable
General Comment: PGL Mahomet Transmission does not transport unodorized gas in Class 3 locations.		
[192.605(b) (1)][192.706(b)]	Does the operator's procedure include leak detector equipment survey requirements for lines transporting	Not Applicable

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	un-odorized gas in Class 4 locations - 4½ months but at least 4 times each calendar year?	
<u>General Comment:</u> PGL Mahomet Transmission does not transport unodorized gas in Class 4 locations.		
DISTRIBUTION SYSTEM PATROLLING & LEAKAGE SURVEY PROCEDURES		Status
<u>Category Comment:</u> PGL Mahomet Transmission does not contain any distribution pipelines.		
[192.605(b) (1)][192.721(a)]	Does the operator's procedure require the frequency of patrolling mains to be determined by the severity of the conditions which could cause failure or leakage?	Not Applicable
[192.605(b) (1)][192.721(b)(1)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled in business districts at intervals not exceeding 4½ months, but at least four times each calendar year? and	Not Applicable
[192.605(b) (1)][192.721(b)(2)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled outside business districts at intervals not exceeding 7½ months, but at least twice each calendar year?	Not Applicable
[192.605(b) (1)][192.723(b)(1)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment in business districts as specified, 1/yr (15 months)?	Not Applicable
[192.605(b) (1)][192.723(b)(2)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment outside of business districts as specified, once every 5 calendar years/63 mos.; for unprotected lines subject to .465(e) where electrical surveys are impractical, once every 3 years/39 mos.	Not Applicable
LINE MARKER PROCEDURES		Status
[192.605(b) (1)][192.707]	Does the operator's procedure require that line markers be installed and labeled as required?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit XIII, Section V, Page 8, Pipeline Markers		
TRANSMISSION RECORD KEEPING PROCEDURES		Status

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[192.605(b) (1)][192.709(a)]	Does the operator's procedure require that records must be maintained on repairs to the pipe for the life of the system?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit XIII, Section I, Page 1, Pipeline Inspections and forms		
[192.605(b) (1)][192.709(b)]	Does the operator's procedure require that records must be maintained on repairs to "other than pipe" for 5 years?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit XIII, Section I, Page 1, Pipeline Inspections and forms		
[192.605(b) (1)][192.709(c)]	Does the operator's procedure require that records must be maintained for Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests for 5 years or until next completion of the next inspection cycle?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit XIII, Section I, Page 1, Pipeline Inspections and forms		
TRANSMISSION FIELD REPAIR PROCEDURES		Status
[192.605(b) (1)][192.713(a)(1)]	Does the operator's procedure require that each imperfection or damage that impairs the serviceability of pipe in a steel transmission line operating at or above 40 percent of SMYS must be removed by cutting out and replacing a cylindrical piece of pipe; OR must be repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit XIII, Maintenance, Page 2, Leak and Defect Repairs		
[192.605(b) (1)][192.713(b)]	Does the operator's procedure require that the operating pressure must be at a safe level during repair operations?	Satisfactory
<u>General Comment:</u> See O&M, Integrlys Standard, Part 310, Page 5.		
[192.605(b) (1)][192.715(a)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 if the segment of transmission line is taken out of service?	Satisfactory
<u>General Comment:</u>		

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<i>See O&M, Exhibit XIII, Maintenance Section, Part II, Page 1, Standards</i>		
[192.605(b) (1)][192.715(b)(1)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the weld is not leaking?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit XIII, Maintenance Section, Part II, Page 1, Standards</i>		
[192.605(b) (1)][192.715(b)(2)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the pressure is reduced to produce a stress that is 20% of SMYS?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit XIII, Maintenance Section, Part II, Page 1, Standards</i>		
[192.605(b) (1)][192.715(b)(3)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the grinding is limited so that 1/8 inch thickness of pipe weld remains?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit XIII, Maintenance, Page 4, Leak and Defect Repairs</i>		
[192.605(b) (1)][192.715(c)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) and cannot be repaired in accordance with .715(a) or .715(b) then a full encirclement welded split sleeve of appropriate design must be installed?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit XIII, Section I, Maintenance, Page 9, Full Encirclement Steel Repair Sleeve</i>		
[192.605(b) (1)][192.717(a)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by removing the leak by cutting out and replacing a cylindrical piece of pipe? OR	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit XIII, Maintenance, Page 2, Leak and Defect Repairs</i>		

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[192.605(b) (1)][192.717(b)(1)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a full encirclement welded split sleeve of appropriate design, unless the transmission line is joined by mechanical couplings and operates at less than 40 percent of SMYS? OR	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit XIII, Section I, Maintenance, Page 9, Full Encirclement Steel Repair Sleeve</i>		
[192.605(b) (1)][192.717(b)(2)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a properly designed bolt-on-leak clamp if the leak is due to a corrosion pit? OR	Not Applicable
<u>General Comment:</u> <i>PGL Mahomet Transmission does not utilize bolt-on repair clamps as a means to repair leaks.</i>		
[192.605(b) (1)][192.717(b)(3)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is due to a corrosion pit and on pipe of not more than 40,000 psi (267 Mpa) SMYS, fillet weld over the pitted area a steel plate patch with rounded corners, of the same or greater thickness than the pipe, and not more than one-half of the diameter of the pipe in size? OR	Not Applicable
<u>General Comment:</u> <i>All pipe used in the PGL Mahomet system is 42000 psi or higher.</i>		
[192.605(b) (1)][192.717(b)(4)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is on a submerged pipeline in inland navigable waters, mechanically apply a full encirclement split sleeve of appropriate design? OR	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit XIII, Maintenance, Page 2, Leak and Defect Repairs</i>		
[192.605(b) (1)][192.717(b)(5)]	Does the operator's procedure require that each permanent field repair of a leak on a transmission line must be made by applying a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	Satisfactory

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<u>General Comment:</u> See O&M, <i>Integrlys Standard, Section 316.2.6, Repair of Steel Pipe</i>		
[192.605(b) (1)][192.719(a)]	Does the operator's procedure require that replacement pipe must be pressure tested to meet the requirements of a new pipeline?	Satisfactory
<u>General Comment:</u> See O&M, <i>Exhibit XIII, Maintenance Section, Part I, Leak and Defect Repairs, Page 9, Replacement Pipe</i>		
[192.605(b) (1)][192.719(b)]	Does the operator's procedure require that for lines of 6-inch diameter or larger and that operate at 20% of more of SMYS, the repair must be nondestructively tested in accordance with §192.241(c)?	Satisfactory
<u>General Comment:</u> See O&M, <i>Integrlys Standard 315.1, NDT - Standards of Acceptability</i>		
TEST REQUIREMENTS FOR REINSTATING SERVICE LINES		Status
<u>Category Comment:</u> PGL Mahomet Transmission does not contain any distribution pipelines or services.		
[192.605(b) (1)][192.725(a)]	Does the operator's procedure require that disconnected service lines must be tested the same as a new service line?	Not Applicable
[192.605(b) (1)][192.725(b)]	Does the operator's procedure require that service lines that are temporarily disconnected must be tested from the point of disconnection, the same as a new service line, before reconnect?	Not Applicable
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
[192.605(b) (1)][192.727(b)]	Does the operator's procedure require disconnecting both ends, purge, and seal each end before abandonment or a period of deactivation where the pipeline is not being maintained?	Satisfactory
<u>General Comment:</u> See O&M, <i>Integrlys Standard 1050.5, Main Abandonment</i>		
[192.605(b) (1)][192.727(c)]	Does the operator's procedure require that, except for service lines, each inactive pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end?	Satisfactory
<u>General Comment:</u> See O&M, <i>Integrlys Standard 1050.5, Main Abandonment</i>		

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[192.605(b) (1)][192.727(d)(1)]	Does the operator's procedure require that whenever service to a customer is discontinued the valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator? OR	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission does not have any distribution pipelines or customers.		
[192.605(b) (1)][192.727(d)(2)]	Does the operator's procedure require that whenever service to a customer is discontinued a mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly? OR	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission does not have any distribution pipelines or customers.		
[192.605(b) (1)][192.727(d)(3)]	Does the operator's procedure require that whenever service to a customer is discontinued the customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission does not have any distribution pipelines or customers.		
[192.605(b) (1)][192.727(e)]	Does the operator's procedure require that if air is used for purging, the operator shall ensure that a combustible mixture is not present after purging?	Satisfactory
<u>General Comment:</u> See O&M, Integrys Standard 1040.2.1, General Requirements		
[192.605(b) (1)][192.727(f)]	Does the operator's procedure require that each abandoned vault be filled with a suitable compacted material?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission does not contain any vaults.		
[192.605(b) (1)][192.727(g)]	Does the operator's procedure require that the operator must file reports upon abandoning underwater facilities crossing commercially navigable waterways, including offshore facilities?	Satisfactory
<u>General Comment:</u> See O&M, Integrys Standard 1050.5, Page 7, Main Abandonment		
COMPRESSOR STATION PROCEDURES		Status
<u>Category Comment:</u>		

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PGL Mahomet Transmission does not contain any compressor stations.

[192.605(b)(7)][192.605(b)(6)]	Does the operator's procedure include provisions for isolating units or sections of pipe and for purging before returning to service?	Not Applicable
[192.605(b)(7)][192.605(b)(7)]	Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices?	Not Applicable
[192.605(b)(7)][192.731]	Does the operator's procedure require inspection and testing for remote control shutdowns and pressure relieving devices at a minimum of 1 per yr/15 months), prompt repair or replacement?	Not Applicable
[192.605(b)(7)][192.731(b)]	Does the operator's procedure require when any defective or inadequate relief device is found that it must be promptly repaired or replaced?	Not Applicable
[192.605(b)(7)][192.735(a)]	Does the operator's procedure require storage of excess flammable or combustible materials at a safe distance from the compressor buildings?	Not Applicable
[192.605(b)(7)][192.735(b)]	Does the operator's procedure require above ground storage tanks to be protected according to NFPA #30; Amdt 192-103 pub. 06/09/06 eff. 07/10/06?	Not Applicable
[192.605(b)(7)][192.736(a)(1)]	Does the operator's procedure require that compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: 50% of the upright side areas are permanently open? OR	Not Applicable
[192.605(b)(7)][192.736(a)(2)]	Does the operator's procedure require compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: It is an unattended field compressor station of 1000 hp or less?	Not Applicable
PRESSURE LIMITING and REGULATING STATION PROCEDURES		Status
[192.605(b)(1)][192.739(a)(1)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is in good mechanical condition?	Satisfactory
<u>General Comment:</u>		
<i>See O&M, Exhibit 13, Section II, Page 5, Regulator Valve Maintenance Survey</i>		
[192.605(b)(1)][192.739(a)(2)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a	Satisfactory

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	minimum of 1 per yr/15 months to determine if the equipment is adequate from the standpoint of capacity and reliability of operation for the service in which it is employed	
<u>General Comment:</u>		
See O&M, Exhibit 13, Section II, Page 5, Relief Valve Maintenance		
[192.605(b) (1)][192.739(a)(3)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is set to control or relieve at correct pressures consistent with .201(a), except for .739(b).	Satisfactory
<u>General Comment:</u>		
See O&M, Exhibit 13, Section II, Page 5, Relief Valve Maintenance		
[192.605(b) (1)][192.739(a)(4)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is properly installed and protected from dirt, liquids, and other conditions that may prevent proper operation.	Satisfactory
<u>General Comment:</u>		
See O&M, Exhibit 13, Section II, Page 5, Relief Valve Maintenance		
[192.605(b) (1)][192.739(b)]	Does the operator's procedure require steel pipelines whose MAOP is determined under §192.619(c), if the MAOP is 60 psi (414 kPa) gauge or more, the control or relief pressure limit is as required by .739 (b).	Satisfactory
<u>General Comment:</u>		
See O&M, Exhibit 13, Section IV, Page 7		
[192.605(b) (1)][192.741(a)]	Does the operator's procedure require telemetering or recording pressure gauges to be in place to indicate gas pressure in the district that is supplied by more than one regulating station?	Satisfactory
<u>General Comment:</u>		
See O&M, General Section, Page 1, Supervisory Control and Data Acquisition System		
[192.605(b) (1)][192.741(b)]	Does the operator's procedure require the operator to determine the need in a distribution system supplied by only one district station?	Not Applicable
<u>General Comment:</u>		
PGL Mahomet Transmission does not contain distribution pipelines.		

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[192.605(b) (1)][192.741(c)]	Does the operator's procedure require the operator to inspect equipment and take corrective measures when there are indications of abnormally high or low pressure?	Satisfactory
General Comment: <i>See O&M, General Section, Page 4, General System Description</i>		
[192.605(b) (1)][192.743(a)]	Does the operator's procedure require that capacity must be consistent with .201(a) except for .739(b), and be determined at a minimum of 1 per yr/15 months?	Satisfactory
General Comment: <i>See O&M, Exhibit 13, Section IV, Page 7</i>		
[192.605(b) (1)][192.743(b)]	If the capacities are calculated, Does the operator's procedure require them to be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates?	Not Applicable
General Comment: <i>Capacities for the relief valves on PGL Mahomet are not calculated.</i>		
[192.605(b) (1)][192.743(c)]	Does the operator's procedure require new or additional devices be installed to provide required capacity if insufficient capacity exists?	Not Applicable
General Comment: <i>There are currently no plans to expand the 2 lines that make up the PGL Mahomet Transmission pipeline.</i>		
VALVE AND VAULT MAINTENANCE PROCEDURES		Status
[192.605(b) (1)][192.745(a)]	Does the operator's procedure require that each transmission valve that might be required during an emergency is inspected and partially operated at a minimum of 1 per year/15 months?	Satisfactory
General Comment: <i>See O&M, Exhibit 13, Section II, Inspections and Surveys, Page 5</i>		
[192.605(b) (1)][192.745(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any transmission valve found inoperable, unless the operator designates an alternative valve?	Unsatisfactory
NOA Comment: <i>The operator's procedure does not require that prompt remedial action will be taken to correct any transmission valve found inoperable, unless the operator designates an alternative valve.</i>		
[192.605(b) (1)][192.747(a)]	Does the operator's procedure require that each distribution valve that might be required during an emergency is checked and serviced at a minimum of	Not Applicable

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	1 per year/15 months?	
<u>General Comment:</u> PGL Mahomet Transmission's gas system does not contain any distribution pipelines.		
[192.605(b) (1)][192.747(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any valve found inoperable, unless the operator designates an alternative valve?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission's gas system does not contain any distribution pipelines.		
[192.605(b) (1)][192.749]	Does the operator's procedure require that vaults greater than 200 cubic feet must be inspected at a minimum of 1 per year/15 months?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission's gas system does not contain any vaults.		
[192.13(c)][192.179(a)]	Does the operator's procedure specify the minimum spacing requirements for transmission sectionalizing block valves?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 13, Section IV, Page 7		
[192.13(c)][192.179(c)]	Does the operator's procedure require between each transmission main line valve to have a blowdown valve with enough capacity to allow for as rapid blow down as practicable?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit XIII, Maintenance Section, Part IV, Valves, Piping and Fittings, Page 7		
PREVENTION of ACCIDENTAL IGNITION PROCEDURES		Status
[192.605(b) (1)][192.751(a)]	Does the operator's procedure require that when a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided?	Satisfactory
<u>General Comment:</u> See Integrys Standard 1040.2.1 Safety, Purging, Page 3		
[192.605(b) (1)][192.751(b)]	Does the operator's procedure prohibit gas or electric welding or cutting on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work?	Satisfactory
<u>General Comment:</u>		

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See Integritys Standard, 1040.2.1 Safety, Purging, Page 4

[192.605(b) (1)][192.751(c)]	Does the operator's procedure require that warning signs will be posted, where appropriate?	Satisfactory
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General Comment:

See Integritys Standard, 1040.2.1 Safety, Purging, Page 4

CAULKED BELL AND SPIGOT JOINTS PROCEDURES	Status
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Category Comment:

PGL Mahomet Transmission does not contain any cast iron pipelines.

[192.605(b) (1)][192.753(a)]	Does the operator's procedure require that each cast iron caulked bell and spigot joint that is subject to pressures of more than 25 psi gage must be sealed with mechanical clamp, or sealed with material/device which does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in §192.753(a)(2)(iii)?	Not Applicable
[192.605(b) (1)][192.753(b)]	Does the operator's procedure require that when cast iron bell and spigot subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means other than caulking?	Not Applicable

PROTECTING CAST-IRON PIPELINE PROCEDURES	Status
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Category Comment:

PGL Mahomet Transmission does not contain any cast iron pipelines.

[192.605(b) (1)][192.755(a)(1)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from vibrations from heavy construction equipment, trains, trucks, buses or blasting?	Not Applicable
[192.605(b) (1)][192.755(a)(2)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from impact forces by vehicles?	Not Applicable
[192.605(b) (1)][192.755(a)(3)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from earth movement?	Not Applicable

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[192.605(b) (1)][192.755(a)(4)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from apparent future excavations near the pipeline?	Not Applicable
[192.605(b) (1)][192.755(a)(5)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from other foreseeable outside forces which might subject the segment of pipeline to a bending stress?	Not Applicable
[192.605(b) (1)][192.755(b)]	Does the operator's procedure require the operator to as soon as feasible; provide permanent protection for the disturbed segment from external loads?	Not Applicable
WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES		Status
[192.13(c)][192.225(a)]	Does the operator's procedure require their welding procedures to be qualified under Section 5, 12 or Appendix A of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test?	Satisfactory
General Comment: See O&M, Exhibit 13, Page 1, Welding and Mechanical Connections		
[192.13(c)][192.225(b)]	Does the operator's procedure require each welding procedure to be recorded in detail, including the results of the qualifying tests?	Satisfactory
General Comment: Qualified Welding procedures 302 (12.2), Page 1		
[192.13(c)][192.227(a)]	Does the operator's procedure require their welders be qualified in accordance with Section 6, 12 or Appendix A of API 1104 or Section IX of ASME Boiler and Pressure Code?	Satisfactory
General Comment: See O&M, Exhibit XIII, Maintenance, Welding and Mech Connect, Page 1, Standards		
[192.13(c)][192.227(b)]	Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS?	Not Applicable
General Comment: No segments of PGL Mahomet Transmission's pipeline operates below 20% SMYS.		
[192.13(c)][192.229(a)]	Does the operator's procedure require a welder to successfully complete a destructive test to weld on compressor station piping and components?	Not Applicable

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<u>General Comment:</u> <i>There are no compressor stations as part of PGL Mahomet Transmission's pipeline.</i>		
[192.13(c)][192.229(b)]	Does the operator's procedure require no welder may weld with a particular welding process unless, within the preceding 6 months, he has engaged in welding with that process?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit XIII, Maintenance, Welding and Mech Connect, Page 1, Standards</i>		
[192.13(c)][192.229(c)(1)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at > 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the sections 6, 9, 12 or Appendix A of API Standard 1104?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit XIII, Maintenance, Welding and Mech Connect, Page 1, General</i>		
[192.13(c)][192.229(c)(2)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at < 20% SMYS unless the welder is tested in accordance with .229(c) (1) or requalifies under .229(d) (1) or (d) (2)?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit 13, Section II, Page 2, Qualification of Welders</i>		
[192.13(c)][192.229(d)(1)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 1 year/15 months? OR	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit 13, Section II, Page 2, Qualification of Welders</i>		
[192.13(c)][192.229(d)(2)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 7 1/2 months but at least twice per calendar year and has met the requirements of .229(d)(i)(ii)?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit 13, Section II, Page 2, Qualification of Welders</i>		
[192.13(c)][192.231]	Does the operator's procedure require that welding operations must be protected from weather conditions that would impair the quality of the completed weld?	Satisfactory
<u>General Comment:</u> <i>See Integrys Standard 310.3.3, Protection from Weather</i>		

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[192.13(c)][192.233]	Does the operator's procedure require that miter joints be made in accordance with this section?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit 13, Section II Page 4, Production Welding</i>		
[192.13(c)][192.235]	Does the operator's procedure require proper welding surface preparation and joint alignment?	Satisfactory
<u>General Comment:</u> <i>O&M, Exhibit 13, Page 3, General Welding Procedures</i>		
[192.13(c)][192.241(a)(1)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure compliance with the welding procedure?	Not Applicable
<u>General Comment:</u> <i>All welds made on the Mahomet Transmission pipeline are non-destructively tested.</i>		
[192.13(c)][192.241(a)(2)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure that the weld is acceptable in accordance with Section 9 of API 1104?	Not Applicable
<u>General Comment:</u> <i>All welds made on the Mahomet Transmission pipeline are non-destructively tested.</i>		
[192.13(c)][192.241(b)(1)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except welds that are visually inspected and approved by a qualified welding inspector if the nominal pipe diameter is less than 6 inches? OR	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit 13, Section II, Page 7, Inspection</i>		
[192.13(c)][192.241(b)(2)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except a pipeline that is to operate at a pressure that produces a hoop stress of less than 40% of SMYS and the welds are so limited in number that nondestructive testing is impractical?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit 13, Section II, Page 7, Inspection</i>		
[192.13(c)][192.241(c)]	Does the operator's procedure require that the acceptability of a weld, which is based on	Satisfactory

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	nondestructively tested or visually inspected, is determined according to the standards in Section 9 or Appendix A of API Standard 1104?	
General Comment: <i>See O&M, Exhibit 13, Section II, Page 7, Inspection</i>		
[192.13(c)][192.245(a)]	Does the operator's procedure require that each weld that is unacceptable must be removed or repaired?	Satisfactory
General Comment: <i>See Integrys Standard 316.2.1, Page 2</i>		
[192.13(c)][192.245(b)]	Does the operator's procedure require that each weld that is repaired must have the defect removed down to sound metal, and the segment to be repaired must be preheated if conditions exist which would adversely affect the quality of the weld repair?	Satisfactory
General Comment: <i>See Integrys Standard 316.2.1, Page 2</i>		
[192.13(c)][192.245(c)]	Does the operator's procedure require that repair of a crack or any other defect in a previously repaired area must be in accordance with a written weld repair procedure qualified under §192.225?	Not Applicable
General Comment: <i>Integrys Standards prohibit a weld being repaired a second time. See Integrys Standard 316.2.2, Page 2.</i>		
Discuss with the operator regarding the use of a low hydrogen process when welding a sleeve for repair.		No
TRANSMISSION NONDESTRUCTIVE TESTING PROCEDURES		Status
[192.13(c)][192.243(a)]	Does the operator's procedure require that nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld?	Satisfactory
General Comment: <i>See O&M, Exhibit 13, Section II, Page 7, Inspection</i>		
[192.13(c)][192.243(b)(1)]	Does the operator's procedure require that nondestructive testing of welds must be performed in accordance with written procedures?	Satisfactory
General Comment: <i>See O&M, Exhibit 13, Section II, Page 7, Inspection</i>		
[192.13(c)][192.243(b)(2)]	Does the operator's procedure require that nondestructive testing of welds must be performed by persons who have been trained and qualified in the	Satisfactory

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	established procedures and with the equipment employed in testing?	
<u>General Comment:</u> See O&M, Exhibit 13, Section II, Page 7, Inspection		
[192.13(c)][192.243(c)]	Does the operator's procedure require that procedures must be established for the proper interpretation of each nondestructive test of a weld to ensure the acceptability of the weld under §192.241(c)?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 13, Section II, Page 7, Inspection		
[192.13(c)][192.243(d)(1)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference In Class 1 locations at least 10 percent?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission performs NDT testing on 100% of welds.		
[192.13(c)][192.243(d)(2)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 2 locations at least 15 percent?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission performs NDT testing on 100% of welds.		
[192.13(c)][192.243(d)(3)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100% unless impracticable, then 90%?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission performs NDT testing on 100% of welds.		
[192.13(c)][192.243(d)(4)]	When nondestructive testing is required under	Satisfactory

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	§192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference at pipeline tie-ins, 100 %?	
General Comment: <i>See O&M, Exhibit 13, Section II, Page 7, Inspection</i>		
[192.13(c)][192.243(e)]	Does the operator's procedure require that a sample of each welder's work for each day must be nondestructively tested, when nondestructive testing is required under §192.241(b), except for a welder whose work is isolated from the principal welding activity?	Not Applicable
General Comment: <i>PGL Mahomet Transmission performs NDT testing on 100% of welds.</i>		
[192.13(c)][192.243(f)]	Does the operator's procedure require that the operator must retain, for the life of the pipeline, a record showing by mile post, engineering station, or by geographic feature, the number of welds nondestructively tested, the number of welds rejected, and the disposition of the rejected welds?	Satisfactory
General Comment: <i>See O&M, Exhibit 13, Section IV, Page 9</i>		
JOINING of PIPELINE MATERIALS OTHER THAN BY WELDING PROCEDURES		Status
Category Comment: <i>PGL Mahomet Transmission does not contain any plastic pipelines.</i>		
[192.273(b)][192.283(b)]	Does the operator have qualified joining procedures for mechanical joints?	Not Applicable
[192.281(a)][192.281(a)]	Does the operator's procedure prohibit joining plastic pipe by threaded or miter joint?	Not Applicable
[192.273(b)][192.283(a)]	Does the operator have qualified joining procedures for heat fusion, solvent cement, and adhesive joints?	Not Applicable
[192.273(b)][192.283(c)]	Does the operator's procedure require that persons making and inspecting joints must have available a copy of the qualified joining procedure?	Not Applicable
[192.273(b)][192.285(a)]	Does the operator's procedure require that person making joints with plastic pipe must be qualified?	Not Applicable
[192.273(b)][192.285(b)(1)]	Does the operator's procedure require the specimen joint to be visually examined during and after assembly or joining?	Not Applicable
[192.273(b)][192.285(b)(2)]	Does the operator have procedures requiring when a	Not Applicable

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	specimen joint used for personnel qualification in the case of a heat fusion, solvent cement, or adhesive joint be tested under any one of the qualified test methods?	
[192.273(b)][192.285(c)]	Does the operator have procedures that require a person to be requalified once each calendar year at intervals not exceeding 15 months, or after any production joint is found unacceptable by testing under 192.513?	Not Applicable
[192.273(b)][192.285(d)]	Does the operator have a method to determine that each person making joints on plastic pipelines is qualified?	Not Applicable
[192.273(b)][192.287]	Does the operator's procedure require that person inspecting plastic pipe joints must be qualified by appropriate training or experience to evaluate plastic pipe joints?	Not Applicable
CORROSION CONTROL PROCEDURES		Status
[192.605(b) (2)][192.453]	Does the operator's procedure require that corrosion control procedures required by .605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods?	Satisfactory
General Comment: <i>See O&M, Exhibit 10, Page 4, Qualifications for design, installation, operation and maintenance of CP systems.</i>		
[192.605(b) (2)][192.455(a)]	Does the operator's procedure require that pipelines installed after July 31, 1971, buried segments must be externally coated and cathodically protected within one year after completion of construction? (see exceptions in code)	Satisfactory
General Comment: <i>See O&M, Exhibit 10, Page 5, Qualifications for design, installation, operation and maintenance of CP systems/Corrosion Control Methods</i>		
[192.605(b) (2)][192.455(e)]	Does the operator's procedure require that aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8, unless tests or experience indicate its suitability in the particular environment involved?	Not Applicable
General Comment: <i>PGL does not utilize aluminum pipe within the gas system.</i>		
[192.605(b) (2)][192.457(a)]	Does the operator's procedure require that all effectively coated steel transmission pipelines installed prior to August 1, 1971, must be cathodically	Satisfactory

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	protected?	
General Comment: See O&M, Exhibit 10, Page 4, Qualifications for design, installation, operation and maintenance of CP systems.		
[192.605(b) (2)][192.457(b)]	Does the operator's procedure require that cathodic protection must be provided in areas of active corrosion for bare or ineffectively coated transmission lines, and bare or coated compressor station piping, regulator station, meter station piping, and (except for cast iron or ductile iron) bare or coated distribution lines installed before August 1, 1971?	Not Applicable
General Comment: PGL Mahomet does not operate any pipelines that meet the criteria listed in this code part.		
[192.605(b) (2)][192.479(b)]	Does the operator's procedure require coating material to be suitable for the prevention of atmospheric corrosion?	Satisfactory
General Comment: See O&M, Exhibit 10, Page 22, Qualifications for design inst, Atmospheric Corrosion Control		
[192.605(b) (2)][192.459]	Does the operator's procedure require that whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated and remedial actions taken when required?	Satisfactory
General Comment: See O&M, Exhibit 13, Section II, Inspections and Surveys, Page 3		
[192.605(b) (2)][192.461(a),192.461(b)]	Does the operator's procedure address the external protective coating requirements of the regulations?	Satisfactory
General Comment: See O&M, Exhibit 10, Page 24, Remedial Measures		
[192.605(b) (2)][192.463]	Does the operator's procedure require cathodic protection levels that comply with one or more applicable criteria contained in Appendix D?	Satisfactory
General Comment: See O&M, Exhibit 10, Page 6, Cathodic Protection		
[192.605(b) (2)][192.465(a)]	Does the operator's procedure require pipe-to-soil monitoring at a minimum of 1 per year/15 months and for separately protected short sections of main and transmission main or separately protected service lines require monitoring of 10% of the system to be surveyed annually?	Satisfactory

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<u>General Comment:</u>		
See O&M, Exhibit 13, Section III, Corrosion, Page 2, Measurements		
[192.605(b) (2)][192.465(b)]	Does the operator's procedure require rectifier monitoring be conducted at a minimum of 6 per year/2 1/2 months?	Satisfactory
<u>General Comment:</u>		
See O&M, Exhibit 13, Section III, Corrosion, Page 2, Measurements		
[192.605(b) (2)][192.465(c)]	Does the operator's procedure require critical interference bond monitoring be conducted at a minimum of 6 per year/2 1/2 months and non-critical bond monitoring be conducted at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u>		
See O&M, Exhibit 13, Section III, Corrosion, Page 2, Measurements		
[192.605(b) (2)][192.465(d)]	Does the operator's procedure require that prompt remedial action to correct any deficiencies indicated by the monitoring?	Satisfactory
<u>General Comment:</u>		
See O&M, Exhibit 10, Page 19, Maintenance of Cathodic Protection Systems		
[192.605(b) (2)][192.465(e)]	Does the operator's procedure require electrical surveys on bare and unprotected lines at a minimum of once per 3 years/39 months and must cathodically protect active corrosion areas, if found?	Not Applicable
<u>General Comment:</u>		
PGL Mahomet Transmission's gas system contains no bare or unprotected pipelines.		
[192.605(b) (2)][192.467(a)]	Does the operator's procedure require that each buried or submerged pipeline be electrically isolated from other underground metallic structures, unless interconnected?	Satisfactory
<u>General Comment:</u>		
See O&M, Exhibit 13, Page 11, Corrosion Control Design and Casings		
[192.605(b) (2)][192.467(b)]	Does the operator's procedure require that one or more insulating devices must be installed where electrical isolation of a portion of a pipeline is necessary to facilitate the application of corrosion control?	Satisfactory
<u>General Comment:</u>		
See O&M, Exhibit 13, Page 8, Insulated Fittings		
[192.605(b) (2)][192.467(c)]	Does the operator's procedure require that each	Satisfactory

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	pipeline must be electrically isolated from metallic casings that are a part of the underground system?	
<u>General Comment:</u> <i>See O&M, Exhibit 13, Page 8, Casing Insulators</i>		
[192.605(b) (2)][192.467(d)]	Does the operator's procedure require that inspection and electrical tests must be made to assure that electrical isolation is adequate?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit 13, Page 24, Shorted Casings</i>		
[192.605(b) (2)][192.469]	Does the operator's procedure define how a sufficient number of test stations or contact points for electrical measurement are established to determine the adequacy of cathodic protection?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit 13, Page 8, Test Leads</i>		
[192.605(b) (2)][192.471]	Does the operator's procedure define how test leads will be installed and maintained?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit 13, Page 8, Test Leads</i>		
[192.605(b) (2)][192.473(a)]	Does the operator's procedure require the determination of how interference currents are affecting the cathodic protection system?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit 10, Page 20, Interference Currents</i>		
[192.605(b) (2)][192.473(b)]	Does the operator's procedure require the determination that impressed current type cathodic protection system or galvanic anode system are designed and installed to minimize any adverse effects on existing adjacent underground metallic structures?	Satisfactory
<u>General Comment:</u> <i>See O&M, Exhibit 10, Page 20, Interference Currents</i>		
[192.605(b) (2)][192.475(a)]	Does the operator's procedure require that if corrosive gas is transported by pipeline, the corrosive effect of the gas on the pipeline must be investigated and steps taken to minimize internal corrosion?	Not Applicable
<u>General Comment:</u> <i>PGL Mahomet Transmission does not transport corrosive gas.</i>		
[192.605(b) (2)][192.475(b)]	Does the operator's procedure require that whenever	Satisfactory

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	any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion?	
<u>General Comment:</u> See O&M, Exhibit 10, Page 21, Internal Corrosion Control		
[192.605(b) (2)][192.475(b)(1)]	Does the operator's procedure require that when internal corrosion is observed that the adjacent pipe will be inspected for internal corrosion?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 10, Page 21, Internal Corrosion Control		
[192.605(b) (2)][192.475(b)(2)]	Does the operator's procedure require replacement of pipe when internal corrosion is observed to the extent required by the applicable paragraphs of §§192.485, 192.487, or 192.489?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 10, Page 21, Internal Corrosion Control		
[192.605(b) (2)][192.475(b)(3)]	Does the operator's procedure require the steps that must be taken when internal corrosion is discovered?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 10, Page 21, Internal Corrosion Control		
[192.605(b) (2)][192.476(a)]	Does the operator's procedure require features incorporated into its design and construction of transmission lines installed after May 23, 2007, to reduce internal corrosion?	Unsatisfactory
<u>NOA Comment:</u> The operator's procedure does not require features incorporated into its design and construction of transmission lines installed after May 23, 2007, to reduce internal corrosion.		
[192.605(b) (2)][192.476(c)]	Does the operator's procedure require an evaluation of the impact of internal corrosion to the downstream portion of the existing pipeline when a transmission pipeline configuration is changed to provide for removal of liquids and monitoring of internal corrosion as appropriate?	Unsatisfactory
<u>NOA Comment:</u> The operator's procedure does not require an evaluation of the impact of internal corrosion to the downstream portion of the existing pipeline when a transmission pipeline configuration is changed to provide for removal of liquids and monitoring of internal corrosion as appropriate.		
[192.605(b) (2)][192.477]	Does the operator's procedure require, if corrosive gas is being transported, the use of internal corrosion control coupons, or other suitable means of monitoring at a minimum of 2 per year/7 1/2 months?	Satisfactory
<u>General Comment:</u>		

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See O&M, Exhibit 10, Page 22, Internal Corrosion Control		
[192.605(b) (2)][192.479(a)]	Does the operator's procedure require each exposed pipe, including soil-to-air interface, to be cleaned and coated?	Satisfactory
<u>General Comment:</u> X, Section 7, Page 22, Atmospheric Corrosion Control		
[192.605(b) (2)][192.481(a)]	Does the operator's procedure require atmospheric corrosion control monitoring at a minimum of 1 per 3 years/39 months?	Satisfactory
<u>General Comment:</u> X, Section 7, Page 22, Atmospheric Corrosion Control		
[192.605(b) (2)][192.481(b)]	Does the operator's procedure require particular attention to atmospheric corrosion on exposed pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 10, Page 21, Maintenance of Cathodic Protection Systems		
[192.605(b) (2)][192.481(c)]	Does the operator's procedure require protection be provided if atmospheric corrosion is discovered?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 10, Page 19, Monitoring of Cathodic Protection Systems		
[192.605(b) (2)][192.483]	Does the operator's procedure require that replacement pipe be coated and cathodically protected?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 10, Page 19, Monitoring of Cathodic Protection Systems		
[192.605(b) (2)][192.485(a)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if general corrosion has reduced the wall thickness?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 10, Page 21, Internal Corrosion Control		
[192.605(b) (2)][192.485(b)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if localized corrosion has reduced the wall thickness?	Satisfactory
<u>General Comment:</u>		

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See O&M, Exhibit 10, Page 21, Internal Corrosion Control		
[192.605(b) (2)][192.485(c)]	Does the operator's procedure require the use of Rstreng or B-31G to determine the remaining wall strength?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 10, Page 21, Internal Corrosion Control		
[192.605(b) (2)][192.487(a)]	Does the operator have procedures to replace or repair distribution pipe if general corrosion has reduced the wall thickness?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission's gas system contains no distribution pipelines.		
[192.605(b) (2)][192.487(b)]	Does the operator have procedures to replace or repair distribution pipe if localized corrosion has reduced the wall thickness?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission's gas system contains no distribution pipelines.		
[192.605(b) (2)][192.489(a)]	Does the operator have procedures to replace pipe if general graphitization is discovered on cast or ductile iron pipe?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission's gas system contains no cast iron pipelines.		
[192.605(b) (2)][192.489(b)]	Does the operator have procedures to repair or replace pipe or seal by internal sealing methods when localized graphitization is discovered on cast or ductile iron pipe?	Not Applicable
<u>General Comment:</u> PGL Mahomet Transmission's gas system contains no cast iron pipelines.		
[192.605(b) (2)][192.491(a)]	Does the operator have procedures requiring the retention of records and maps to show the location of cathodically protected pipe, facilities, anodes, and bonded structures?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 10, Page 25, Corrosion Control Records		
[192.605(b) (2)][192.491(b)]	Does the operator have procedures requiring the retention of records under .491(a) for the life of the pipeline?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 10, Page 25, Corrosion Control Records		

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[192.605(b) (2)][192.491(c)]	Does the operator have procedures that require the retention of testing, surveys, or inspections records which detail the adequacy of the corrosion control measures for a minimum of 5 years?	Satisfactory
<u>General Comment:</u> See O&M, Exhibit 10, Page 25, Corrosion Control Records		
UPRATING PROCEDURES		Status
<u>Category Comment:</u> Uprating procedures can be found in Integrys Standard 1105.2, Uprating Requirements, Page 2.		
[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include pressure raised in increments?	Satisfactory
[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include section checked before further pressure increase?	Satisfactory
[192.13(c)][192.553(a)(2)]	Does the operator's procedure include uprating requirements which meet Subpart K and include hazardous leaks repaired between increments?	Satisfactory
[192.13(c)][192.553(b)]	Does the operator's procedure include uprating requirements which meet Subpart K and include records kept for life of system?	Satisfactory
TRAINING		Status
<u>Category Comment:</u> Training records were not reviewed as part of this audit.		
[520.10(a)(1)]	Does the operator's procedure contain adequate descriptions of types of training each job classification requires, including those of field foreman, field crew leaders, leak inspectors, new construction inspectors, servicemen and corrosion technicians and/or equivalent classifications?	Not Checked
[520.10(a)(2)]	Does the operator's procedure include scheduling of verbal instruction and/or on-the-job training for each job classification?	Not Checked
[520.10(a)(3)]	Does the operator's procedure include provisions for evaluating the performance of personnel to assure their competency in performing the work assigned to them?	Not Checked
[520.10(a)(4)]	Does the operator's procedure include subject matter relating to recognition of potential hazards, and actions to be taken toward prevention of accidents?	Not Checked

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[520.10(a)(5)]	Are the operator's procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Not Checked
[520.10(a)(6)]	Are the operator's procedures made a part of the gas system's operation, inspection and maintenance plan, and filed with the Commission?	Not Checked
[520.10(b)]	Does the operator's procedure require that the operator/personnel (municipal/master meter) attend regularly scheduled instructional courses held by utility companies or participate in courses such as the IGT Gas Distribution Home Study Course, or programs developed and presented by community colleges, vocational schools, universities, consultants or other recognized gas distribution oriented agencies?	Not Checked
[520.10(a)]	Does the operator's procedure specify methods to be used for training, including frequency and subject matter of training?	Not Checked

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